

AFFIRMATIVE DEFENSES

1. Defendant(s) hereby incorporate(s) by reference those affirmative defenses enumerated in JCRCP 8 as though fully set forth herein, as applicable upon discovery. In the event further investigation or discovery reveals the applicability of any such defenses, Defendant(s) reserve(s) the right to seek leave of court to amend this Answer to more specifically assert any such defense. Such defenses are herein incorporated by reference for the specific purposes of not waiving any such defenses.

_____. Accord and satisfaction.

_____. Arbitration and award.

_____. Assumption of risk.

_____. Contributory negligence.

_____. Discharge in bankruptcy.

_____. Duress.

_____. Estoppel.

_____. Failure of consideration.

☒ Fraud. Plaintiff does not reside in Mississippi.

_____. Illegality.

_____. Injury by fellow servant.

_____. Laches.

_____. License.

_____. Payment.

_____. Release.

☒ Res Judicata. See exhibit 7a-C. Previous court judgement. (attached)

_____. Statute of frauds.

_____. Statute of limitations.

_____. Waiver.

ABSTRACT OF CIVIL COURT RECORD FROM JUSTICE COURT

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THE STATE OF MISSISSIPPI
KEMPER COUNTY

BOOK 300 PAGE 1461
STATUS: A

In the Justice Court of said County at the August term thereof, A.D. 2019, judgement was rendered as follows, namely: in the case of

WRIGHT DORSYL
VS
DAVIS KATHY
300 WALTER REED RD
PRESTON, MS 39354

Amount of Judgement rendered		
th day of		, 0000
COURT FEE	\$ 64.00
	\$
	\$
	\$
	\$
TOTAL	\$ 64.00
AMOUNT PAID ON JUDGEMENT		\$
LEAVING DUE THEREON	\$ 64.00

CAUSE OF ACTION: REPLEVIN

FILED: 08/13/2019

DISPOSITION: NO JUDGEMENT GIVEN

DATE: 08/27/2019

JUDGMENT DATE: 00/00/0000 IN FAVOR OF:

JUDGMENT AMOUNT

GARNISHMENT: (Y/N)

DORSYL WRIGHT ACKNOWLEDGED UNDER OATH THAT SHE WAS AWARE OF FORCLOSURE FEB 2019 AND NOTICE FROM CHANCERY COURT JUNE 2019 AND KATHY DAVIS OWNED THE PROPERTY AS OF JULY 11, 2019. NO JUDGMENT RENDERED AGAINST KATHY DAVIS 08/27/2019, GULLY

I CERTIFY THAT THIS IS A TRUE AND CORRECT COPY OF THE COURT RECORD AS
RECORDED IN : BOOK 300 PAGE 1461



LYNN PUCKETT, CLERK
KEMPER COUNTY JUSTICE COURT

BY:  , Clerk

** Please Reference BOOK 300 PAGE 1461 on all correspondence

7c

JUDGEMENT/ADDENDUM INFORMATION

~~Defendant~~ Dorel Wright
acknowledged under oath
that she was aware of foreclosure
Feb 2019 and notice from chancery
June 2019 and Kathy Davis owned
property as of July 11, 2019
no judgement rendered
against Kathy Davis

ADDENDUM INFORMATION

8-27-
July

Attorney
Jeremy Chalmers



Chalmers Law Inc.

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